

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
v.)	1:21-cr-10182-GAO
)	
MICHAEL ROBERT MOURA)	
)	

**MOTION TO CANCEL INITIAL PRETRIAL CONFERENCE
AND SCHEDULE RULE 11 HEARING**

Now comes Mr. Moura and moves this Honorable Court to cancel the Initial Pretrial Conference scheduled for March 30, 2022 and schedule the matter for a Rule 11 Hearing in approximately 30 days. In support thereof, the government provided a draft plea agreement on March 26, 2022 in response to discussions between the parties as to the terms of a proposed resolution. Counsel requires time to review the plea agreement with Mr. Moura. In addition, counsel will be unavailable for the currently scheduled Pretrial Conference due to an unexpected medical issue. Because Mr. Moura believes the case will be resolve by way of a guilty plea, he requests that the Court schedule a Rule 11 Hearing in approximately 30 days.

Respectfully submitted,

MICHAEL ROBERT MOURA

By
/s/ Joshua R. Hanye
Joshua R. Hanye
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Certificate of Service

I, Joshua R. Hanye, hereby certify that this document was this day filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (“NEF”).

Date: March 29, 2022

/s/ Joshua R. Hanye
Joshua R. Hanye